



Order Filed on September 23, 2024
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Shannon Burrini, Esq.
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Attorney for Creditor, Pro Cap 8 FBO Firsttrust Bank

In Re:

Shirley Simpson

Case No.: 24-11039

Adv. No.:

Hearing Date:

Judge: Andrew B. Altenburg, Jr.

CONSENT ORDER PERMITTING LATE PROOF OF CLAIM

The relief set forth on the following pages, numbered one (1) through three (3) is hereby
ORDERED.

DATED: September 23, 2024


Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court

Debtor: Shirley Simpson
Case No: 24-11039
Caption of Order: CONSENT ORDER PERMITTING LATE PROOF OF CLAIM

THIS MATTER having come before the Court on the Application of Pro Cap 8 FBO Firstrust Bank (the “Creditor”), by and through Counsel, Shannon Burrini, Esquire, appearing, and the Debtor, by and through Counsel, Robert Braverman, having consented hereto and good cause having been shown;

IT is hereby, ORDERED as follows:

1. Creditor is the holder of Tax Sale Certificate #22-00396, which is secured by Property located at 5427 Burwood Ave., Camden, NJ; Block: 6115, Lot: 6.
2. Creditor is permitted to file a Proof of Claim notwithstanding its filing after the deadline imposed by Fed. R. Bankr. P. 3002(c). Creditor’s Proof of Claim will be filed promptly upon entry of this Consent Order.
3. Debtor reserves the right to object to the secured Creditor’s Proof of Claim once filed.

We hereby consent to the form and entry of the within Order.

PRO CAPITAL MANAGEMENT III, LLC

By: /s/ Shannon Burrini
Shannon Burrini, Esq.
Attorney for Creditor, Pro Cap 8 FBO Firstrust Bank

MCDOWELL LAW, PC

By: /s/ Robert Braverman
Robert Braverman, Esq.
Attorney for the Debtor